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*Attorneys for Defendant: Otto Trucking LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto  
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HONG-AN VU IN  
SUPPORT OF DEFENDANT OTTO  
TRUCKING LLC'S RESPONSE TO  
PRECIS**

Courtroom: 8  
Judge: Hon. William Alsup  
Trial Date: October 10, 2017

Filed/Lodged Concurrently with:  
1. Response to Precis

1 I, Hong-An Vu, declare as follows:

2 1. I am an associate at the law firm of Goodwin Procter, LLP, representing defendant  
3 Otto Trucking LLC (“OT”) in this matter. I am a member in good standing of the State Bar of  
4 California. I make this declaration in support of Otto Trucking LLC’s Response to Precis (the  
5 “Response”). I make this declaration based upon matters within my own personal knowledge and  
6 if called as a witness, I could and would competently testify to the matters set forth herein.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the  
8 deposition of Zachary Morriss dated July 26, 2017.

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the  
10 deposition of Chelsea Bailey dated August 1, 2017.

11 4. Attached hereto as **Exhibit 3** is a true and correct copy of WAYMO-UBER-  
12 00033601.

13 5. Attached hereto as **Exhibit 4** is a true and correct copy of WAYMO-UBER-  
14 00022238.

15 6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the  
16 30(b)(6) deposition of Gary Brown dated August 8, 2017.

17 7. Attached hereto as **Exhibit 6** is a true and correct copy of WAYMO-UBER-  
18 00014469.

19 8. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from the  
20 deposition of Brent Schwarz dated August 15, 2017.

21 9. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts from the  
22 deposition of Pierre-Yves Droz Vol. 1 dated April 31, 2017.

23 I declare under penalty of perjury under the laws of the United States that the foregoing is  
24 true and correct. Executed this 24th day of August, 2017 in Los Angeles, California.

25  
26 /s/ Hong-An Vu  
Hong-An Vu

**ATTORNEY ATTESTATION**

I hereby attest, pursuant to Local Rule 5-1(i)(3), that I obtained the concurrence in the filing of this document from the signatory indicated by the conformed (/s/) of Hong-An Vu.

/s/ Neel Chatterjee  
NEEL CHATTERJEE

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **August 24, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **August 24, 2017**.

/s/ Neel Chatterjee  
NEEL CHATTERJEE